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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

JUL 16 1997
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of)
)
Advanced Television Systems) MM Docket No. 87-268
and Their Impact upon the Existing)
Television Broadcast Service)

**OPPOSITION TO PETITION FOR RECONSIDERATION
OF SOUTH CENTRAL COMMUNICATIONS CORPORATION**

Speer Communications Holdings I Limited Partnership ("Speer"),
licensee of WNAB(TV), NTSC channel 58, Nashville, Tennessee, by its attorneys
hereby opposes the petition for reconsideration filed in this proceeding on June 13,
1997, by South Central Communications Corporation ("SCCC"). Speer submits that
the Commission should refrain from considering any changes to the Table of
Allotments until the record in this proceeding is supplemented to take into account the
recently released OET Bulletin No. 69.

In its petition for reconsideration, SCCC recommends several changes to
the Table of Allotments to accommodate four of its LPTV stations and two proposed
full-power stations for which it has filed applications. In particular, SCCC proposes
that the DTV assignment of WNAB be changed from channel 23 to channel 34 to

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eliminate the potential for interference to LPTV station WJDE-LP, Channel 24, Nashville.

Speer, in a petition for reconsideration also filed on June 13, 1997, has urged the Commission to change its DTV channel assignment, but did not propose an alternative assignment in view of the unavailability of OET Bulletin No. 69. Speer explained, that as a practical matter, it could not come close to replicating its analog coverage with its DTV signal.¹ In addition, Speer urged the Commission to accord it and other similarly situated licensees the opportunity to supplement their petitions for reconsideration with proposed alternative assignments after the release of OET Bulletin No. 69.

The Commission has now released the OET Bulletin and given interested parties until August 22, 1997 to supplement their petitions.² In these circumstances, as indicated in the attached engineering statement of John F.X. Browne, P.E. ("Engineering Statement"), there is insufficient information available as to the feasibility or the desirability of any specific changes to the Table of Allotments. SCCC's proposal to substitute channel 34 DTV for channel 23 DTV can be accomplished only if Knoxville channel 34 DTV is also changed to eliminate co-channel interference.³ Moreover, because Speer operates with a directional antenna, it

¹ Speer Petition for Reconsideration at 4.

² Order, DA 97-1377 (rel. July 2, 1997).

³ Engineering Statement at 2.


may be unable on channel 34 to maximize its digital coverage, or even replicate its existing analog service area, if restricted by relatively close spacing of co-channel facilities.

Given these uncertainties, the Commission should not implement changes at this time in the Table of Allotments, particularly where, as here, the proponent of the change is an LPTV station, which is not entitled to assignment of a DTV channel under the priorities set forth in the Fifth Report and Order in this proceeding.⁴ Accordingly, the Commission should deny SCCC's petition for reconsideration or withhold action on it pending the submission of supplements to outstanding petitions for reconsideration in light of the release of OET Bulletin No. 69.

Respectfully submitted,

SPEER COMMUNICATIONS HOLDINGS
I LIMITED PARTNERSHIP

By:


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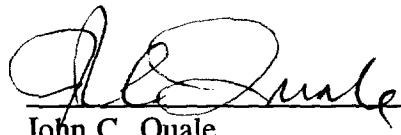
July 18, 1997

⁴ See Fifth Report and Order at ¶ 18 (rel. April 21, 1997).

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of July, 1997, I caused a copy of the foregoing "Opposition to Petition for Reconsideration of South Central Communications Corporation" to be served by U.S. mail, postage prepaid on the following:

Edward S. O'Neill
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John C. Quale

B**ENGINEERING STATEMENT**

of

John F. X. Browne, P.E.

re

Opposition to Petition for Reconsideration**South Central Communications Corporation****Nashville, TN**

South Central Communications Corporation (SCCC), through its counsel, filed a petition for reconsideration in MM Docket 87-268 relative to the Commission's Sixth Report and Order. In that petition SCCC recommends several channel allotment changes intended, primarily, to protect its low power TV stations.

This firm has been retained by Speer Communications Holdings I Limited Partnership (Speer), the licensee of WNAB, Nashville, TN. One of the proposals made by SCCC would change the DTV allotment of WNAB from Channel 23 to Channel 34.

General Considerations

Speer is concerned about the viability of its Channel 23 allotment, particularly with regard to its ability – or lack thereof – to “maximize” its DTV station in the future. These concerns were expressed in its petition for reconsideration filed in this proceeding. However, Speer is concerned that any changes to the table of allotments must be viewed in the context of the “big-picture” created by

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consideration of area/regional allotment scenarios. SCCC has apparently relied on the table of substitute channels prepared by MSTV to identify a replacement for the WNAB DTV allotment; this table has not been independently verified relative to interference nor has SCCC submitted any technical information regarding the viability of this channel.

Specific Issues

SCCC proposes that Channel 34 be substituted for Channel 23 at Nashville. However, Channel 34 is assigned for DTV use at Knoxville, some 150 miles to the East of Nashville. It is also proposed to change the Knoxville Channel 34 DTV allotment (to Channel 46) thus eliminating potential co-channel interference issues which might arise. However, these changes must be made simultaneously to achieve the non-interference status. Also, Speer is concerned that future attempts to "maximize" coverage on a Channel 34 DTV facility may be restricted by the relatively close spacing to other co-channel facilities. Now that OET-69 is available, Speer intends to supplement its Petition for Reconsideration relative to its channel allotment prior to the August 22, 1997 deadline.

Conclusion

There is insufficient information available as to the feasibility or desirability of any specific changes to the table of allotments and the Commission should refrain from making changes which are driven by considerations of LPTV entities as opposed to the primary needs of full service DTV stations.

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Certification

This statement was prepared by me or under my direction. All assertions contained in the statement are true of my own personal knowledge except where otherwise indicated and these latter assertions are believed to be true.

A handwritten signature in black ink, appearing to read "John F.X. Browne", written over a horizontal line.

John F.X. Browne, P.E.
July 16, 1997